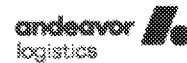


Andeavor Logistics LP
1801 California Street, Suite 1200
Denver, CO 80202

andeavorlogistics.com

RECEIVED JUN - 5 2019



June 4, 2019

Ms. Claudia Smith
Tribal NSR and PSD Permits Lead
U.S. EPA, Region 8
1595 Wynkoop Street, 8ARD-PM
Denver, CO 80202-1129

FedEx #775301552610

Mr. Mike Natchees
Director, Air Quality Program
Energy & Minerals Department
Ute Indian Tribe
988 South 7500 East
Fort Duchesne, UT 84026

FedEx #775301584752

**Re: Federal Implementation Plan, Part 1 Registration
Ponderosa Compressor Station
Uintah County, Utah**

Dear Ms. Smith & Mr. Natchees,

Andeavor Logistics LP (Andeavor) is submitting this Tribal Minor Source Registration to the U.S. Environmental Protection Agency, Region 8, in accordance with the Federal Implementation Plan (FIP) for Managing Air Emissions from True Minor Sources in Indian Country in the Oil and Natural Gas Production and Natural Gas Processing Segments of the Oil and Natural Gas Sector. This registration is for the Ponderosa Compressor Station, a "true minor" oil and gas facility that is located on the Uintah & Ouray Indian Reservation in Uintah County, Utah.

Andeavor is planning to make modifications to the facility that would result in net increases in emissions. Prior to commencing construction on the planned modifications, Andeavor must comply with applicable provisions of the Federal Minor New Source Review Program in Indian Country, as codified in 40 CFR 49.151 through 164. The attached registration includes the required Part 1 form and all associated documentation in accordance with 40 CFR §49.160(c)(1)(iv).

The following outlines facility information and applicable requirements associated with the Federal Minor New Source Review Program in Indian Country that apply to the facility and the proposed modifications.

Source Classification Background

Since January 8, 2015, the Ponderosa Compressor Station has been operating a triethylene glycol (TEG) dehydration unit that has been determined to be subject to applicable MACT provisions of Subpart HH (40 CFR 63.763-777) which require emission control for reductions in hazardous air pollutant (HAP) emissions. The controls required by MACT HH result in equivalent control of volatile organic compounds (VOC) emissions from the dehydration unit. Considering the required federally enforceable controls, the facility's VOC emissions are less than 100 tpy.

The facility currently operates in compliance with Permit SMNSRUO-002078-2017.003 issued by EPA on April 6, 2017. EPA developed a Technical Support Document (TSD) when the existing permit was developed (https://www.epa.gov/sites/production/files/2017-04/documents/tesoro_ponderosa_cs_smnsr-uo-002078-2017.003_admin_record.pdf). As stated in the TSD, the permit was issued to establish federal enforceability for the following primary purposes:

- The co-benefit VOC emission reductions resulting from the MACT HH dehydrator HAP emission control requirements, and
- The existing voluntary control of storage tank emissions.

Andeavor believes that EPA's statement shown below from the TSD that the requirements of MACT HH are only enforceable for the HAP emissions specifically targeted by the rule is incorrect.

Excerpt from the Ponderosa Compressor Station TSD for Proposed Permit #SMNSR-UO-002178-2015.002, page 7:

Independently enforceable applicable requirements, such as New Source Performance Standards (NSPS) and NESHAP are considered enforceable to the extent that the source is in compliance with the standard. In addition, reductions in non-targeted pollutants resulting from compliance with an independently enforceable applicable requirement may be counted as restrictions on PTE, provided the emission reduction of the non-targeted pollutant is enforceable as a practical matter.

The TEG dehydration system is subject to the requirements for major HAP sources in NESHAP HH. NESHAP HH applies enforceable restrictions to reduce emissions of certain HAP that are also VOC. However, the TEG dehydration

system also emits other VOC that are not HAP regulated by NESHAP HH. The requirements of NESHAP HH are only enforceable as a practical matter for those specific HAP targeted by the rule that are also VOC. Therefore, in order for the control requirements to be enforceable as a practical matter for all VOC emitted from the TEG dehydration system, there must be emissions limitations (emissions limit, operational limitations, and associated monitoring, recordkeeping, and reporting requirements) related specifically to total VOC emissions.

The statement above from the TSD is in direct conflict with the June 3, 2016, preamble (<https://www.govinfo.gov/content/pkg/FR-2016-06-03/pdf/2016-11969.pdf>) for the Final Oil and Gas Federal Implementation Plan (FIP) Rule, 40 CFR 49.101 through 105, and modifications to the Federal Minor New Source Review Program in Indian Country, 40 CFR 49.151 through 164. As shown in Reference 1 (attached), EPA established in the June 3, 2016, Federal Register that HAP emissions are a surrogate for VOC, and that MACT HH emission controls are enforceable limits for VOC emissions. The June 3, 2016, final FIP rule and accompanying preamble predates the issuance of the Ponderosa Compressor Station permit. Based on the June 3, 2016, Final Oil and Gas FIP Rule preamble, it was unnecessary and incorrect for EPA to have issued the Ponderosa Compressor Station permit to make the dehydrator's VOC emission controls enforceable given that they were de facto enforceable (see Reference 1).

Due to the dehydrator VOC emissions being enforceable as a result of MACT HH requirements, the existing facility was, in fact, a "true minor" source when EPA issued the permit. It would be inappropriate to issue such a permit to a facility that was not a "synthetic minor source" as defined in the Federal Minor New Source Review Program in Indian Country regulations. Since the permit was issued under the 40 CFR 49.158 regulation specifically designated for "synthetic minor sources", and because the facility does not meet the definition of a "synthetic minor source," it appears that the intended purpose of the permit was baseless, and the 40 CFR 49.158 permitting mechanism was not applicable to the Ponderosa Compressor Station.

In summary, the following are applicable to the Ponderosa Compressor Station:

- It is an existing true minor source.
- It was a true minor on October 3, 2016, the effective date of the Final Oil and Gas FIP Rule.
- The facility has not been modified since the October 3, 2016, effective date of the FIP rule.


Ms. Claudia Smith
Mr. Mike Natchees
June 4, 2019
Page 4 of 4

Therefore, the facility has not triggered a new permitting or a registration requirement to date, and it is in compliance with the regulations for the Federal Minor New Source Review Program in Indian Country. It was unnecessary for the existing facility to have obtained a permit or register for the FIP.

The proposed modifications will also result in the facility remaining a "true minor" source (NO_x and VOC emissions will each be less than the 100-tpy threshold for marginal ozone nonattainment areas). The change in emissions associated with the proposed modifications will be greater than the de minimis values in the provisions of the Federal Minor New Source Review Program in Indian Country. Because the facility will remain a true minor source, an option in the Federal Minor New Source Review Program in Indian Country regulations is registering according to the Oil and Gas FIP Rule requirements.

If you have any questions or require additional information regarding this registration, please contact me at (303) 454-6685 or Thomas.H.Gibbons@andeavor.com.

Sincerely,



Thomas H. Gibbons
HES Professional

Enclosure: FIP Part I Registration Package



United States Environmental Protection Agency

<https://www.epa.gov/tribal-air/tribal-minor-new-source-review>

April 29, 2019

Part 1: Submit 30 Days Prior to Beginning Construction -- General Facility Information

FEDERAL IMPLEMENTATION PLAN FOR TRUE MINOR SOURCES IN INDIAN COUNTRY IN THE OIL AND NATURAL GAS PRODUCTION AND NATURAL GAS PROCESSING SEGMENTS OF THE OIL AND NATURAL GAS SECTOR

Registration for New True Minor Oil and Natural Gas Sources and Minor Modifications at Existing True Minor Oil and Natural Gas Sources

Please submit information to:

[Reviewing Authority
 Address
 Phone]

U.S. EPA, Region 8
 1595 Wynkoop Street, 8P-AR
 Denver, CO 80202-1129
 (303) 312-6520

A. GENERAL SOURCE INFORMATION (See Instructions Below)

1. Company Name Andeavor Field Services LLC		2. Source Name Ponderosa Compressor Station	
3. Type of Oil and Natural Gas Operation Natural Gas Compressor Station		4. New Minor Source? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
		5. Minor Source Modification? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
6. NAICS Code 211111		7. SIC Code 1311	
8. U.S. Well ID(s) or API Number(s) [if applicable] not applicable			
9. Area of Indian Country Uintah & Ouray Indian Reservation	10. County Uintah	11a. Latitude 40.08807	11b. Longitude -109.453332

B. CONTACT INFORMATION (See Instructions Below)

1. Owner Name Andeavor Field Services LLC	Title N/A
Mailing Address 1801 California Street, Suite 1200; Denver, CO 80202	
Email Address 	
Telephone Number (303) 454-6685	Facsimile Number N/A
2. Operator Name (if different from owner) Andeavor Logistics	Title
Mailing Address 1801 California Street, Suite 1200; Denver, CO 80202	
Email Address 	
Telephone Number (303) 454-6685	Facsimile Number N/A
3. Source Contact Thomas Gibbons	Title HES Professional
Mailing Address 1801 California Street, Suite 1200; Denver, CO 80202	
Email Address Thomas.H.Gibbons@andeavor.com	
Telephone Number (303) 454-6685	Facsimile Number N/A

4. Compliance Contact		Title	
same as Source Contact			
Mailing Address			
Email Address			
Telephone Number		Facsimile Number	

C. ATTACHMENTS

Include all of the following information as attachments to this form:

- ☒ Narrative description of the operations.
- ☒ Identification and description of all emission units and air pollution generating activities (with the exception of the exempt emissions units and activities listed in §49.153(c).
- ☒ Identification and description of any air pollution control equipment and compliance monitoring devices or activities that are expected to be used at the facility.
- ☒ Estimated operating schedules.
- ☒ If satisfying the requirements under §49.104(a)(1), documentation that another federal agency has complied with its requirements under the Endangered Species Act (ESA) and the National Historic Preservation Act (NHPA) when authorizing the activities for the facility/activity covered under this registration. The appropriate documents shall clearly show that the other federal agency had met its obligations under both the ESA and NHPA. A simple reference to a Record of Decision or other final decision document will not be acceptable. Examples of acceptable documentation would be a letter from the U.S. Fish and Wildlife Service field office (for ESA) or a historic preservation office (for NHPA) stating they agree with the assessment conducted by the other federal agency for the subject project and that the requirements of those statutes have been met. The documentation shall be submitted within the Part 1 registration.
- ☐ If satisfying the requirements under §49.104(a)(2), the letter provided by the Reviewing Authority indicating satisfactory completion of the specified screening procedures to address threatened or endangered species and historic properties. The documentation shall be submitted under the Part 1 registration. (The procedures are contained in the following document: "Procedures to Address Threatened or Endangered Species and Historic Properties for the Federal Implementation Plan for True Minor Sources in Indian Country in the Oil and Natural Gas Production and Natural Gas Processing Segments of the Oil and Natural Gas Sector," <https://www.epa.gov/tribal-air/tribal-minor-new-source-review>).
- ☐ Other.

Instructions for Part 1

Please answer all questions. If the item does not apply to the source and its operations write "n/a". If the answer is not known write "unknown".

A. General Source Information

1. Company Name: Provide the complete company name. For corporations, include divisions or subsidiary name, if any.
2. Source Name: Provide the source name. Please note that a source is a site, place, or location that may contain one or more air pollution emitting units.
3. Type of Operation: Indicate the generally accepted name for the oil and natural gas production or natural gas processing segment operation (e.g., oil and gas well site, tank battery, compressor station, natural gas processing plant).
4. New True Minor Source: [Per Federal Indian Country Minor New Source Review Rule, 40 CFR 49.153].
5. True Minor Source Modification: [Per Federal Indian Country Minor New Source Review Rule, 40 CFR 49.153].
6. North American Industry Classification System (NAICS): The NAICS Code for your oil and natural gas source can be found at the following link for North American Industry Classification System:
<http://www.census.gov/eos/www/naics/>.
7. Standard Industrial Classification Code (SIC Code): Although the new NAICS code has replaced the SIC codes, much of the Clean Air Act permitting processes continue to use these codes. The SIC Code for your oil and natural gas source can be found at the following link for Standard Industrial Classification Codes:
http://www.osha.gov/pls/imis/sic_manual.html.
8. U.S. Well ID or API Number: Unique well identifier as assigned by the Federal or State oil and gas regulatory agency with primacy, using the American Petroleum Institute (API) Standard for number format (pre-2014) or the Professional Petroleum Data Management (PPDM) Association US Well Number Standard (2014-present). Provide IDs for all oil and natural gas production wells associated with the facility, if applicable. May not be applicable for downstream production sources, such as compressor stations.
9. Area of Indian Country: Provide the name of the Indian reservation within which the source is operating.
10. County: Provide the County within which the source is operating.
11. Latitude & Longitude (11a. and 11b.): Provide latitude and longitude location(s) in decimal degrees, indicating the datum used in parentheses. These are GPS (global positioning system) coordinates. This information should be provided in decimal degrees with 6 digits to the right of the decimal point, indicating the datum used in parentheses (i.e., NAD 27, NAD 83, WGS 84 – WGS 84 is preferred over NAD 27).

B. Contact Information

Please provide the information requested in full.

1. Owners: List the full name (last, middle initial, first) of all owners of the source.
2. Operator: Provide the name of the operator of the source if it is different from the owner(s).
3. Source Contact: The source contact must be the local contact authorized to receive requests for data and information.
4. Compliance Contact: The compliance contact must be the local contact responsible for the source's compliance with this rule. If this is the same as the Source Contact please note this on the form.

C. Attachments

The information requested in the attachments will enable the U.S. Environmental Protection Agency (EPA) to understand the type of oil and natural gas source being registered.

Disclaimers:

The public reporting and recordkeeping burden for this collection of information is estimated to average 6 hours per response. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including through the use of automated collection techniques to the Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822T), 1200 Pennsylvania Ave., NW, Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed form to this address.

Information in these forms submitted in compliance with the final Federal Indian Country Minor New Source Review rule may be claimed as confidential. A company may assert a claim of confidentiality for information submitted by clearly marking that information as confidential. Such information shall be treated in accordance with EPA's procedures for information claimed as confidential at 40 CFR part 2, subpart B, and will only be disclosed by the means set forth in the subpart. If no claim of confidentiality accompanies the report when it is received by EPA, it may be made public without further notice to the company (40 CFR 2.203).

C. ATTACHMENTS

Narrative Description of the Operations

At the Ponderosa Compressor Station, a comingled stream (containing natural gas, condensate, and water) flows from the field via pipeline to a separator on location. In the separator, the stream is separated into its individual phases (natural gas and liquids).

The natural gas phase exits the separator and is routed as follows:

The gas stream exits the inlet separator and flows to a compressor which compresses the gas before entering the dehydration unit. The existing compressor is driven by a Solar Taurus 70 combustion turbine which is fueled with natural gas. The modified facility will add a second compressor driven by a Solar Mars 90S combustion turbine fueled with natural gas.

Upon entering the glycol dehydration unit, the natural gas bubbles up through triethylene glycol (TEG) in a process vessel known as a contactor. During this process water vapor is removed from the gas to a concentration determined by a sales contract. The pipeline quality natural gas then exits the contactor, is metered, and is routed off location. There is an existing 55-MMscfd dehydration unit, and the modification will add a second 65-MMscfd dehydration unit.

The TEG exits the contactor and is first routed through a flash tank separator. The flash vapors are currently sent to an open flare to be burned. The modified facility will capture the flash tank vapors from both dehydration units and route them back to the station inlet with a vapor recovery unit (VRU) which has an enclosed combustor for backup when the VRU is offline.

The TEG is then regenerated using heat in vessels known as reboilers. There is an existing 1-MMBtu/hr reboiler, and the modification will add a 1-MMBtu/hr reboiler for the second dehydration unit. Natural gas-fired heaters heat the TEG to a set temperature that boils the impurities out of the TEG. The vapors from the reboilers are routed to BTEX condensers and the overhead vapors are sent to open flares, one for each dehydration unit. The regenerated TEG is circulated back through the contactor.

The liquid phase exits the separator and is routed as follows:

Currently, condensate flows to a 400-barrel (bbl) condensate tank on location that acts as a gunbarrel separator. From there, the condensate flows to an adjoining 400-bbl tank and the produced water flows to an adjoining 300-bbl produced water tank. The existing tanks are controlled with an enclosed combustor. The modified facility will add one 400-bbl condensate tank and one 300-bbl produced water tank, and all five tanks will be controlled with a VRU which has enclosed combustors for backup when the VRU is offline.

Once adequate volumes are accumulated in the adjoining condensate tanks, the condensate is trucked off location to be sold. Likewise, once adequate volumes are accumulated, the produced water is trucked off location for further processing or treatment.

There are fugitive emissions associated with the potential seeping of gas from connections, seals, flanges and valves. Instrument air is utilized onsite for energizing pneumatic equipment.

Tank truck loading emissions also occur during the loading of condensate and produced water to the tanker trucks. The condensate and produced water are submerge-filled as trucks are loaded. As the condensate and produced water are pumped into trucks, the fluids displace the vapors. The displacement causes the vapors to vent from inside the truck to the atmosphere.

Emission Units and Air Pollution Generating Activities

Identification and description of all emission units and air pollution generating activities [with the exception of the exempt emissions units and activities listed in §49.153(c)].

Emission units and air pollution generating activities at the modified facility will include:

- Two natural gas-fired combustion turbines (total design rating of approximately 24,000 hp)
- Two TEG dehydrator units (total design rating of 120 MMscfd), each equipped with a flash tank, BTEX condenser, and controlled by a flare
- Two 1.0-MMBtu/hr reboilers, one for each dehydrator unit
- Five storage tanks: three 400-bbl (condensate), two 300-bbl (produced water); emissions are controlled by a VRU equipped with two backup combustors
- Compressor blowdowns (venting)
- Fugitive emissions
- Tank loadouts (condensate, produced water)

Air Pollution Control Equipment and Compliance Monitoring

Identification and description of any air pollution control equipment and compliance monitoring devices or activities that are expected to be used at the facility.

- Combustion turbines are subject to NSPS Subpart KKKK and will have periodic NO_x emissions testing.
- Calendar quarter leak surveys will be conducted for compliance with NSPS Subpart OOOOa for the collection of fugitive emissions components at a compressor station.
- The dehydrators are subject to the major source provisions of MACT Subpart HH which require 95% emissions control.

Estimated Operating Schedules

Normal operation of the facility will be 24 hours per day, 7 days per week.

§49.104(a)(1) Documentation

See attached documentation that addresses threatened or endangered species and historic properties, including the U.S. Department of the Interior, Bureau of Indian Affairs, approval of the project and the associated Environmental Analysis Report which documents compliance with requirements under the Endangered Species Act (ESA) and the National Historic Preservation Act (NHPA) when authorizing the activities for the facility covered under this registration.

Note that the facility is already constructed and is operating, and no additional land will be disturbed as part of this modification. The facility underwent ESA and NHPA reviews and was cleared by the jurisdictional land management agencies in 2007.

§49.104(a)(1) Documentation

CULTURAL RESOURCE INVENTORY OF
QUESTAR GAS MANAGEMENT'S PROPOSED
PONDEROSA COMPRESSOR AND 12 INCH PIPELINE
UINTAH COUNTY, UTAH

Jacki A. Montgomery

CULTURAL RESOURCE INVENTORY OF
QUESTAR GAS MANAGEMENT'S PROPOSED
PONDEROSA COMPRESSOR AND 12 INCH PIPELINE
UINTAH COUNTY, UTAH

By:

Jacki A. Montgomery

Prepared For:

Ute Indian Tribe
Uintah and Ouray Agency
and
Bureau of Land Management
Vernal Field Office

Prepared Under Contract With:

Questar Gas Management
11018 East 17500 South
Vernal, UT 84078

Prepared By:

Montgomery Archaeological Consultants, Inc.
P.O. Box 219
Moab, Utah 84532

MOAC Report No. 07-125

May 1, 2007

United States Department of Interior (FLPMA)
Permit No. 07-UT-60122

State of Utah Antiquities Project (Survey)
Permit No. U-07-MQ-0428b,i

Ute Tribal Permit No. A07-363

INTRODUCTION

A cultural resource inventory was conducted by Montgomery Archaeological Consultants Inc. (MOAC) in April 2007 for Questar Gas Management's proposed Ponderosa compressor and 12 inch suction pipeline. The project area occurs south of Glen Bench in Uintah County, Utah. This survey was implemented at the request of Mr. Brent Searle, Questar Gas Management, Vernal, Utah. The project is situated on Ute Tribal Lands (Uintah and Ouray Agency) and public lands administered by the Bureau of Land Management (BLM), Vernal Field Office.

The objective of the inventory was to locate, document, and evaluate any cultural resources within the project area in order to comply with Section 106 of 36 CFR 800, the National Historic Preservation Act of 1966 (as amended). Also, the inventory was implemented to attain compliance with a number of federal and state mandates, including the National Environmental Policy Act of 1969, the Archaeological and Historic Conservation Act of 1972, the Archaeological Resources Protection Act of 1979, the American Indian Religious Freedom Act of 1978, and Utah State Antiquities Act of 1973 (amended 1990).

The fieldwork was performed on April 4, 2007 by Todd Seacat under the auspices of U.S.D.I. (FLPMA) Permit No. 07-UT-60122 and State of Utah Antiquities Permit (Survey) No. U-07-MQ-0428b,i issued to MOAC, Moab, Utah. The archaeologist was accompanied to the field by Manny Bruns (Ute Tribal Energy and Minerals Technician).

A file search was performed by Keith Montgomery at the BLM (Vernal Field Office) on April 2, 2007. In 2005, Montgomery Archaeological Consultants (MOAC) inventoried Questar Gas Management's 10 mile Glen Bench pipeline and compressor station (Elkins 2005). A portion of the surveyed pipeline crossed Sections 32 and 33, Township 8S, Range 22E and resulted in the documentation of a prehistoric resource processing camp (42Un4710). In 2006, MOAC inventoried Questar Gas Management's Ponderosa pipeline which crossed Sections 33 and 34, Township 8S, Range 22E resulting in no cultural resources within the current project area (Jendresen 2006).

DESCRIPTION OF PROJECT AREA

Questar Gas Management's proposed Ponderosa compressor and 12 inch suction pipeline begins on Ute Indian Tribal land in the SE 1/4 of Section 31 and extends east for 2.9 miles onto BLM land in the NW 1/4 of Section 34 (Figure 1). The Ponderosa compressor station lies mainly in the SW/SW of Section 28. The legal description is Township 8 South, Range 22 East, Sections 28, 29, 31, 32, 33 and 34. A total of 53.4 acres was inventoried of which 47.6 is on Ute Tribal land (Uintah and Ouray Agency) and 5.8 acres occurs on BLM (Vernal Field Office) administered land.

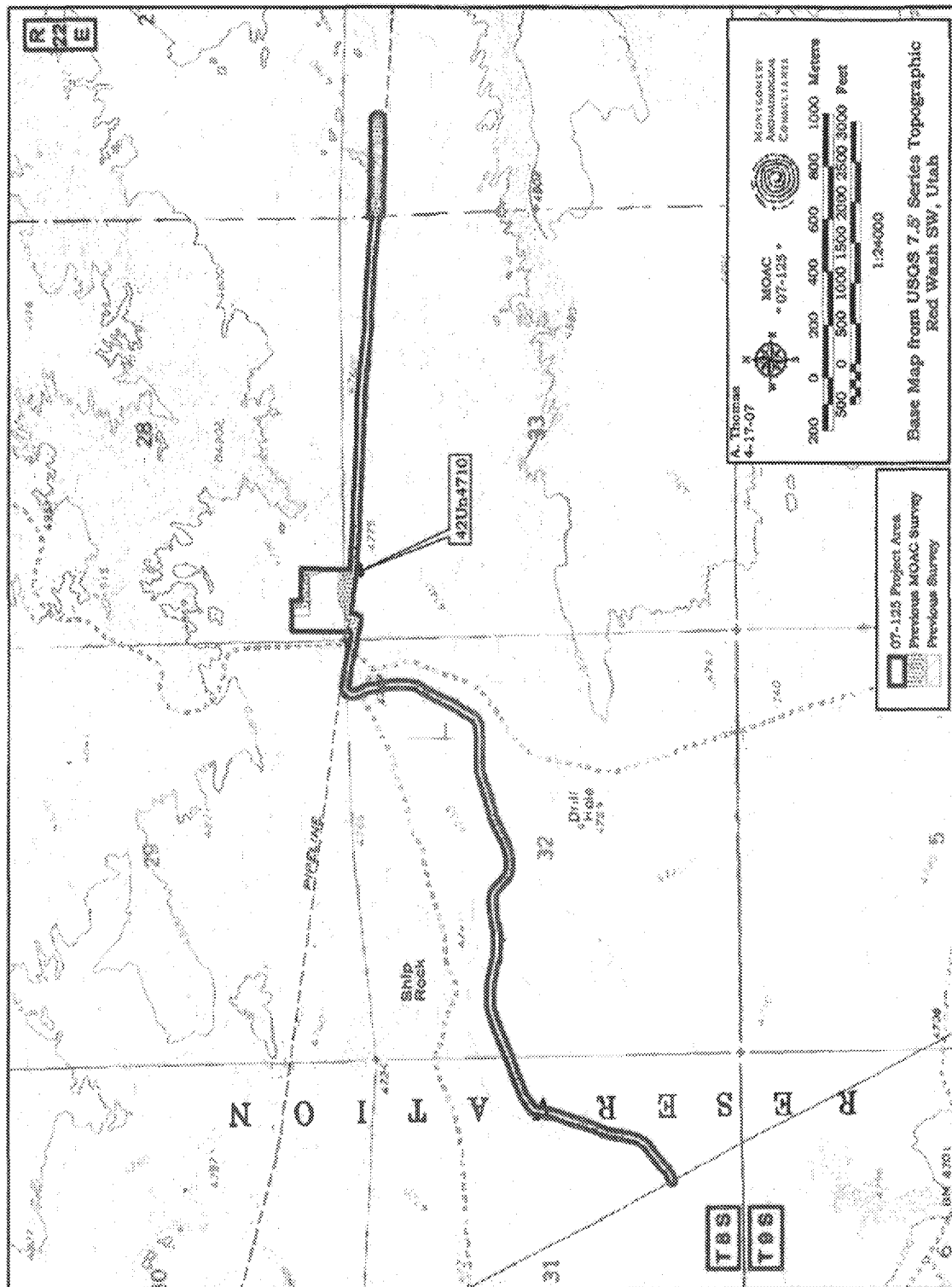


Figure 1. Inventory Area of Questar Gas Management's Ponderosa Compressor Station and 12 Inch Suction Pipeline, Uintah County, Utah.

The study area lies within the Uinta Basin physiographic unit, a distinctly bowl-shaped geologic structure (Stokes 1986:231). The Uinta Basin ecosystem is within the Green River drainage, considered to be the northernmost extension of the Colorado Plateau. The geology is comprised of Tertiary age deposits which include Paleocene age deposits, and Eocene age fluvial and lacustrine sedimentary rocks. The Uinta Formation, which is predominate in the project area, occurs as eroded outcrops formed by fluvial deposited, stream laid interbedded sandstone and mudstone, and is known for its prolific paleontological localities.

Specifically, the project area occurs north of the White River and south of Glen Bench. The area is heavily dissected and carved by ephemeral drainages and characterized by tablelands with rolling dunes. Surface geology consists of hard pan residual soil armored with shale and sandstone pebbles. Elevation ranges between 4710 and 4775 ft asl. The project occurs within the Upper Sonoran Desert Shrub Association which includes sagebrush, shadscale, greasewood, mat saltbush, snakeweed, rabbitbrush, prickly pear cactus, Indian ricegrass and other grasses. Modern disturbances include roads and oil/gas development.

SURVEY METHODOLOGY

An intensive pedestrian survey was performed for this project which is considered 100% coverage. The proposed 12 inch suction pipeline was examined by the archaeologist walking parallel transects spaced no more than 10 m (33 ft) apart. The pipeline was surveyed to a width of 61 m (200 ft) on BLM administrated land and 31 m (100 ft) on Ute Tribal land. The proposed compressor station measured approximately 500 by 700 ft and was examined by the same survey methods as described above. Ground visibility was considered to be good. A total of 53.4 acres was inventoried of which 47.6 is on Ute Tribal land (Uintah and Ouray Agency) and 5.8 acres occurs on BLM (Vernal Field Office) administered land.

INVENTORY RESULTS

The inventory resulted in the location of a previously documented prehistoric site (42Un4710) which is evaluated as eligible to the NRHP.

Smithsonian Site No.: 42Un4710
Temporary Site No.: None
Legal Description: NE/NW/NW, Sec. 33, T 8S, R 22E
NRHP Eligibility: Eligible, Criterion D

Description: This site is a possible prehistoric resource processing camp consisting of numerous groundstone artifacts and a lesser amount of lithic debitage eroding out from the slope of an aeolian dune and scattered within a drainage. A total of 20 lithic flakes were observed representing a wide range of chert and quartzite material types, with some petrified wood also noted. The secondary stage of decortication dominates the flake types, with a large amount of broken flakes, flake fragments, and angular debris; and a lesser amount of tertiary and primary flakes. Thirteen lithic tools were recorded, of which the

majority (n=7) are groundstone fragments. Other tools present include test cobble cores (n=4) and retouched flakes (n=2). In addition to the documented tools, at least 21 additional groundstone fragments were observed. There were no cultural features on the site. The site possesses significant potential for buried cultural material, as numerous artifacts were observed in the eroding cutbank of the dune. No artifacts were observed on the upper surface of the dune, suggesting that the cultural deposits are buried.

MANAGEMENT RECOMMENDATIONS

The cultural resource inventory of Questar Gas Management's proposed Ponderosa compressor and 12 inch suction pipeline resulted in the location of a previously recorded prehistoric site (42Un4710) which is evaluated as eligible to the NRHP. This site occurs along the south edge of the proposed compressor station/pipeline and will be avoided by the undertaking. Based on the findings, a determination of "no historic properties affected" pursuant to Section 106, CFR 800 is proposed for this project.

REFERENCES CITED

- Elkins, M.
2005 Cultural Resource Inventory of Questar Gas Management's 10 Mile Glen Bench Pipeline and Compressor Station on Ute Tribal Lands, Uintah County, Utah. Montgomery Archaeological Consultants, Moab, Utah. Report No. U-05-MQ-0088i.
- Jendresen, A.
2006 Cultural Resource Inventory of Questar Gas Management's Proposed Ponderosa Pipeline (T8S, R22E Sections 33, 34, 35 and 36 and T9S, R22E Sections 4, 9, and 16), Uintah County, Utah. Montgomery Archaeological Consultants, Moab, Utah. Report No. U-06-MQ-1752b,i.
- Stokes, W.L.
1986 *Geology of Utah*. Utah Museum of Natural History and Utah Geological and Mineral Survey, Salt Lake City.

REFERENCE 1
Preambles of the Proposed and Final
O&G FIP Rule

Publications in Federal Register

Vol. 80, No. 181 (September 18, 2015)

Vol. 81, No. 107 (Friday, June 3, 2016)

Excerpt from the Preamble of Proposed O&G FIP Rule Publication in Federal Register /Vol. 80, No. 181 / Friday, September 18, 2015, Page 56569, Paragraph 3:

The NESHAP for process heaters and glycol dehydrators are promulgated pursuant to the EPA's authority under CAA section 112. Under CAA section 112(d)(3), the emission limitations for glycol dehydrators and process heaters at major sources of hazardous air pollutants (HAPs) reflect MACT. The MACT emission limitation for new sources cannot be less stringent than the emission control achieved in practice by the best-controlled similar source, without considering costs. In addition, under CAA section 112(d)(5), the emission reduction requirements for triethylene glycol dehydrators at area sources reflect "generally available control technology" (GACT). For GACT there is no statutory minimum level of emissions reduction for new or existing sources and costs can be considered. We are proposing that the oil and natural gas FIP require sources to comply with the applicable MACT (for glycol dehydrators and process heaters located at major sources of HAP) or GACT (for glycol dehydrators located at area sources of HAP) emission limitations. Because the individual HAP pollutants regulated from glycol dehydrators by the NESHAP (and to some degree from process heaters, as well) for oil and gas production sources are also VOC, which are regulated NSR pollutants, the proposed FIP would create enforceable VOC reduction requirements for glycol dehydrators and process heaters. HAPs would serve as a surrogate for VOC with respect to emission limitations, monitoring, testing and compliance.

Excerpt from the Preamble of Final O&G FIP Rule Publication in Federal Register /Vol. 81, No. 107 / Friday, June 3, 2016, Page 35957, Paragraphs 8 and 9:

Comment #5: One commenter requested that the EPA clarify how numerical VOC emission limitations will be applied through compliance with 40 CFR part 63, subpart HH, when the subpart has numerous compliance options that often do not contain specific numerical emission limitations. The commenter noted that the proposed FIP would create enforceable VOC emission reductions for glycol dehydrators through the requirements of 40 CFR part 63, subpart HH, using HAPs as a surrogate for VOCs.

Response #5: The FIP does not impose a separate VOC limit for glycol dehydration units that are subject to 40 CFR part 63, subpart HH (*i.e.*, independently of the FIP, the source will have to comply with the HAP control requirements, which also effectively control VOC and may or may not involve numerical emissions limitations). While the EPA recognizes that 40 CFR part 63, subpart HH, specifies several different control requirements depending on several factors (*e.g.*, major/area source status of the facility, actual natural gas throughput of the dehydrators, urban/rural location), any dehydrators subject to those standards will satisfy compliance with the FIP for those units by fully complying with the MACT standard. We have not made any changes in response to this comment.

Excerpt from the Preamble of Final O&G FIP Rule Publication in Federal Register /Vol. 81, No. 107 / Friday, June 3, 2016, Page 35969, Paragraph 8:

We proposed that the oil and natural gas FIP require sources to comply with the applicable MACT (for glycol dehydrators and process heaters located at major sources of HAP) or GACT (for glycol dehydrators located at area sources of HAP) emission limitations. Because the individual HAP pollutants regulated from glycol dehydrators by the NESHAP (and to some degree from process heaters, as well) for oil and natural gas production sources are also VOC, which are regulated NSR pollutants, the proposed FIP would create enforceable VOC reduction requirements for glycol dehydrators and process heaters. HAPs would serve as a surrogate for VOC with respect to emission limitations, monitoring, testing and compliance.